

FAMILIES FOR CLEAN AIR

TO: Bay Area Air Quality Management District Planning Department
(Sent via email to pmplanning@baaqmd.gov)

FR: Families for Clean Air

RE: Comments regarding the BAAQMD's report titled "Understanding Particulate Matter: Protecting Public Health in the San Francisco Bay Area"

DATE: September 24, 2012

To Whom It May Concern:

Please accept the following comments regarding the Air District's recent draft document on particulate matter titled "Understanding Particulate Matter: Protecting Public Health in the San Francisco Bay Area" (hereafter referred to as "the PM Report").

After reviewing the PM Report Families for Clean Air (FCA) has several comments and questions regarding the Air District's plans to reduce wood smoke pollution in the Bay Area.

The Air District has identified wood burning to be a major source (38%) of primary PM_{2.5} in the winter months. In addition in PM, wood smoke has many of the same constituents that threaten public health as diesel exhaust which is regulated as a Toxic Air Contaminant in California. The other harmful constituents of wood smoke (beyond just PM) should be included in the discussion about wood burning and its effects on public health (please see the attached chart). FCA also recommends that the Air District work closely with the Office of Environmental Health Hazard Assessment (OEHHA) and the California Air Resources Board to classify wood smoke as a Toxic Air Contaminant (TAC). Doing so would provide regulatory and legal rationale for BAAQMD and other air districts in the state to pursue more aggressive wood smoke pollution reduction strategies (such as seasonal burning bans and bans on wood burning near sensitive populations like schools and hospitals). This dovetails with the Air District's stated goals of developing programs that improve regional ambient air quality as well as directly protecting local public health.

The PM Report states that the District's air monitoring program as well as its CARE and other community outreach programs focus specifically on sites that are affected by mobile PM sources and do not adequately address "hot spots" in the Bay Area where wood smoke pollution is the main source of PM_{2.5} and impacts local populations. FCA strongly recommends that the Air District implement a program to identify wood smoke hot spots in the 9 Bay Area counties, create a monitoring program to characterize the PM at these locations that includes testing for Ultra-fine Particulates to determine the levels of ALL PM exposure for local populations, and work directly with the local communities to reduce wood smoke pollution.

In addition, FCA recommends that the Air District form local alliances with organizations that work on public health issues to further extend its public outreach and education on the health impacts of wood smoke pollution and to encourage more public dialogue about how to best reduce wood smoke in the most affected communities. This would follow the models that BAAQMD has already established in its CARE program.

The PM Report touched on the challenges of reducing wood smoke pollution and the efforts of the District's outreach and education programs. But the Report ignored the importance of enforcement of the District rules. FCA feels strongly that the Air District review and revise its enforcement of Regulation 6-3 to ensure better public compliance with the existing rule. Doing so could lead to a significant decrease in wood smoke pollution on winter Spare the Air days as well as provide impetus for residents to curtail their wood burning on other days as well. This should include hiring more seasonal enforcement staff, better follow-up on reported violations, and stronger sanctions against repeat offenders. We believe that better enforcement will result in a measureable reduction in PM from wood burning.

The PM Report mentioned the USEPA's proposed changes to the Clean Air Act's PM standards. One of these proposals is to change the urban visibility and urban haze standards, models, and measurement. It is not clear from the PM Report how this new "urban" haze standard would apply to the smoky haze that often accumulates in Bay Area valleys due to wood burning in those communities. Will this new standard override the current opacity standards that the Air District uses in Rule 6-3? We suggest making those clarifications in the report.

Since the new proposed changes to the Clean Air Act PM standards are to be adopted in December 2012, will the Air District wait to see what the new standards will be and consequently revise this report taking the new standards and guidance into consideration?

FCA was pleased to see an in-depth discussion of the complex relationship between PM pollution and climate change in the PM Report. However, we believe that the District should continue to stress the point that reducing wood burning and the GHGs and particles that burning wood emits NOW would buy additional time to address more complex sources of climate forcing agents while better protecting public health in the near term. Regardless of the complexities of the way that black and brown carbon impact regional and global climate, scientists agree that reducing wood burning is a positive step and that should be the main message for the public.

The Air District has shown interest in helping homeowners change out their wood-stoves for cleaner heating devices. FCA would like the District to pursue such strategies but specifically recommends that change-outs be the cleanest technologies available and not include traditional wood stoves, even if they are EPA certified. Evidence shows that the EPA wood stove certification program relies on outdated technologies and even the reduced emissions that certified stoves produce will still contribute to the region's PM burden. Because homeowners tend to keep them for decades and not maintain them to the original factory standards, and because there is too much opportunity for improper operation that results in a wide range of PM emissions, EPA certified wood stoves are a poor solution to the long-term

PM problems in the Bay Area. As EPA itself says, there is no safe level of wood smoke exposure. FCA strongly suggests that any wood stove change-out subsidies be used exclusively for the cleanest heating technologies available and eliminate wood-burning device options in order to create the greatest long-term gains in regional air quality.

Many pages of the PM Report were spent on mobile PM sources and actions that are being taken to curtail those emissions as well as plans for the future. But the Report contained very little about wood burning, beyond the fact that the District has instituted Rule 6-3 and will continue to conduct its public education campaign in the winter months. As the single largest source of PM in the Bay Area, FCA believes that the District needs to focus more on creating programs that would target wood burning directly. The PM Report simply states that the District staff does not expect much greater reductions in wood smoke PM in the coming years. Unfortunately that sounds like the District is giving in to inertia and not willing to be more aggressive in your efforts. By increasing enforcement of Rule 6-3, helping to fund wood-stove change-out programs (to non-wood burning heating devices or pellet stoves), and reaching out to doctors and other health providers, the Air District has the opportunity to become a national leader on this issue. The District needs to take more effective and creative steps toward educating the public and providing resources for communities most impacted by wood smoke pollution. We encourage you can take this time to consider new and bolder measures to protect our public health from wood smoke and not just move forward with business as usual.

Sincerely,

Susan Goldsborough

Executive Director

www.familiesforcleanair.org